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Environmental Protection and the Administrator of the New Jersey Spill  
Compensation Fund

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA,  
NEW JERSEY DEPARTMENT OF  
ENVIRONMENTAL PROTECTION, and  
ADMINISTRATOR, NEW JERSEY SPILL  
COMPENSATION FUND

Plaintiffs,

v.

UNIMATIC MANUFACTURING  
CORPORATION, CARDEAN, LLC,  
FRAMEWARE, INC., and PROFILES, LLC,

Defendants.

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Civil Action No. 2:20-cv-17284

**NOTICE OF LODGING OF PROPOSED CONSENT DECREE**

Plaintiffs United States of America, New Jersey Department of Environmental Protection, and Administrator, New Jersey Spill Compensation Fund hereby give notice of lodging of a proposed Consent Decree in the above-captioned action. Attached as an exhibit hereto, the proposed Consent Decree will resolve all claims alleged by Plaintiffs in the Complaint filed in this action.

Plaintiffs are not requesting any action by the Court at this time on the proposed Consent Decree. Instead, the United States will publish notice of the

Consent Decree in the Federal Register and accept public comment for a period of sixty (60) days, in accordance with regulations found at 28 C.F.R. § 50.7. The New Jersey Department of Environmental Protection will also publish notice and accept public comments. During the comment period, no action is required by the Court. If after review and evaluation of any comments received, the Plaintiffs continue to believe that the Consent Decree is fair, reasonable, and in the public interest, they will move the Court to enter the Consent Decree.

Respectfully submitted,

JONATHAN D. BRIGHTBILL  
Principal Deputy Assistant Attorney General  
Environment and Natural Resources Division  
United States Department of Justice

November 27, 2020  
Dated

/s/Katherine L. Matthews  
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November 27, 2020  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 27, 2020, I electronically filed the foregoing *Notice of Lodging of Proposed Consent Decree and Attachment* with the Clerk of Court using the CM/ECF system and that I have served the following via electronic mail:

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